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FILED IN 149
UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH
DEC 11 2008
D. MARK JONES, CLERK
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELISE ANN PETERSON,

Defendant.

: MAGIS. NO. 2:08 MJ 351 PMW

: COMPLAINT

: VIO. 18 U.S.C. § 1708

[Possession of Stolen Mail]

Before a United States Magistrate Judge for the District of Utah, appeared
the undersigned, who on oath deposes and says:

COUNT 1

On or about December 10, 2008, in the Central Division of the District of
Utah,

ELISE ANN PETERSON,

the defendant herein, did unlawfully have in her possession an article which had been stolen from a letter box or mail receptacle, to wit, approximately 150 pieces of first class mail including letters and parcels, knowing the same to have been stolen, in violation of 18 U.S.C. § 1708, and punishable thereunder.

Complainant states that this complaint is based on information obtained through investigation consisting of the following:

1. I am a U.S. Postal Inspector assigned to the U.S. Postal Inspection Service, Salt Lake City, Utah. I have been employed by the U.S. Postal Inspection Service since 2005. I have been assigned to investigate violations of Title 18, United States Code, Section 1708, Theft or Possession of Stolen Mail and other related offenses.

2. On December 10, 2008, Postal Inspector Robert Maes met with Deputy Prettyman of the Salt Lake County Sheriff's Office. Deputy Prettyman informed Inspector Maes of the following:

3. Deputy Prettyman was conducting speed enforcement at 2145 E. Lincoln Lane, Salt Lake City, Utah at approximately 2:45 PM on December 10, 2008. Deputy Prettyman said a woman approached him and informed him she witnessed a woman who was driving down the street and stealing mail. The woman described a white Jeep and a female driving the Jeep who she observed steal mail. The woman also gave the license plate number. Deputy Prettyman said he remembered seeing the Jeep pass him minutes earlier.

4. Deputy Prettyman said he announced over the radio the description of the vehicle and the license plate number. He said that he was notified that Deputy Hunter had observed the vehicle and had stopped it at 1945 E. 4500 S. Deputy Prettyman said he arrived shortly after that and met with Deputy Hunter. Deputy

Prettyman said Deputy Hunter informed the driver, Elise Peterson, that she had been stopped as it was reported she was stealing mail. Deputy Prettyman said Deputy Hunter asked Ms. Peterson for consent to search her vehicle. Ms. Peterson told the deputies they could search her vehicle and she exited the vehicle. Deputy Prettyman said he observed numerous mail pieces in the front seat of the vehicle. He said he saw different names and addresses on the mail pieces. Deputy Prettyman said he also found various packages in the back of the vehicle that were addressed to different names and addresses. Deputy Prettyman said Elise Peterson was placed under arrest.

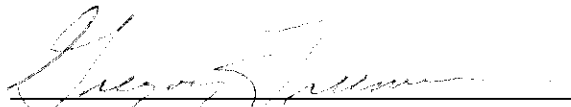
5. Sheriff's deputies contacted me regarding Ms. Peterson's arrest. Postal Inspector Robert Maes and I responded to the Holladay Precinct and met with the deputies. We counted over 150 first class envelopes addressed to numerous persons' names and addresses in the Salt Lake City area.

6. Inspector Maes and I interviewed Elise Peterson. She was advised of her Miranda Rights and stated that she understood her rights, and said that she would talk to us and answer questions presented to her. Ms. Peterson said she had recently lost a job, was kicked out of her house and was down on her luck. She admitted she stole mail for the first time yesterday (December 9th). She said she only stole mail from about five (5) houses yesterday. Ms. Peterson said she obtained a few envelopes and a couple of packages. She said she threw the envelopes and package material away into a dumpster but could not remember where. She said she kept some women's clothing and a CD ROM from the packages.


7. Ms. Peterson said the clothing was in an apartment in West Jordan where she had been staying. She said the CD Rom was in her vehicle. Ms. Peterson admitted that she started stealing mail today (December 10th) at approximately 10:30 AM. She estimated that she stole mail from at least fifty (50) mailboxes, and stole numerous packages off the front porches of residences in the vicinity of Holladay, UT.

8. I observed a red envelope among the recovered mail. It contained a greeting card and bore a first-class stamp. The outside of the envelope bore return

11. Based on the foregoing, affiant believes there is probable cause to believe that on December 10, 2008, in the Central District of Utah, Elisa Ann Peterson did knowingly and unlawfully have in her possession stolen mail in violation of Title 18, United States Code, Section 1708.



GREGORY FREEMAN
Postal Inspector

SUBSCRIBED AND SWORN TO BEFORE ME this 11th day of
December, 2008.


PAUL M. WARNER
United States Magistrate Judge

APPROVED:

BRETT L. TOLMAN
United States Attorney


MICHAEL P. KENNEDY
Assistant United States Attorney